

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Southwest Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**  
**Significant Modification**

Masco Builder Cabinet Group Merillat Atkins Plant 12  
6373 Lee Highway, Atkins, Virginia 24311  
Permit No. SWRO10830  
Effective Date: June 30, 2006  
Expiration Date: June 29, 2011

As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Masco Builder Cabinet Group has applied for a significant modification to the Title V Operating Permit for its Masco Builder Cabinet Group Merillat Atkins Plant 12 facility. The Department has reviewed the application and has prepared a significant modification to the Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: July 22, 2008

Air Permit Manager: \_\_\_\_\_ Date: July 22, 2008

Regional Director: \_\_\_\_\_ Date: July 22, 2008

## **FACILITY INFORMATION**

### Permittee

Masco Builder Cabinet Group  
P.O. Box 259  
Atkins, Virginia 24311

### Facility

Masco Builder Cabinet Group Merillat Atkins Plant 12  
6373 Lee Highway  
Atkins, Virginia

County-Plant Identification Number: 51 - 173 - 00071

## **SOURCE DESCRIPTION**

NAICS Code: 337110 – Wood Kitchen Cabinet and Countertop Manufacturing

The operations at the facility consist of lumber drying, processing and handling, two boilers, and a wood surface coating line. Green lumber is received at the plant from local sources or another plant. Much of the lumber is graded and dried at the facility; however, the facility may receive a significant quantity of pre-dried lumber. Air drying, two pre-dryers, and five kilns are used to lower the moisture content of the green lumber to 6-8%. The kilns and pre-dryers operate using steam generated from one 27.8 MMBtu/hr Industrial Boiler Company wood/oil-fired boiler (equipped with a multicyclone particulate collector) and one 17.8 MMBtu/hr Superior Boiler Works oil/natural gas-fired boiler. Waste from green lumber processing is pneumatically transferred to a trailer via a closed-loop cyclone.

The dried wood is processed using planers, saws, sanders, tennons, and moulding machines typical of this industry. Woodwaste is sent to two hogging machines that grind and transfer it to a silo for boiler fuel. The silo is equipped with two closed loop cyclones, which direct the air to one of six fabric filters that serve most woodworking operations at the plant. Three small fabric filters are located within the plant, and serve two enclosed sanding devices. Polyvinyl acetate glues are used to assemble the cabinet doors.

In the finishing process, a series of sealers, topcoats, and stains are applied to the cabinet doors using nine spray booths equipped with electrostatic spray guns and paint filters. Two topcoat spray booths (including flash and drying areas) and two sealer spray booths are controlled by a

regenerative thermal oxidizer. Two HVLP (high volume low pressure) spray guns are used for touch up operations. Two wiping machines are used to apply stains to some products. The wipe machines are equipped with paint filters for controlling any particulates that may escape the process. The cabinet doors are dried in steam-heated ovens and two natural gas-fired ovens. The coating materials are stored in 9 bulk storage tanks, as well as drums and smaller containers. Wire hooks used to hold the cabinet doors are cleaned using acetone that is recycled and reclaimed by the manufacturer. The finished product is packaged and warehoused for shipment by trucks.

Because the facility has the potential to emit 455.2 tons/yr of VOC, it is considered an existing major source. The boilers are subject to NSPS Subpart Dc.

The facility is a Title V major source of VOC, xylene, and total hazardous air pollutants. This source is located in an attainment area for all pollutants, and is an existing PSD major source. The facility is subject to MACT Subpart JJ for wood furniture manufacturing operations at major sources. The facility is permitted under a minor New Source Review (NSR) permit issued on February 15, 2007 (as amended April 28 and May 19, 2008).

## **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, was completed on August 1, 2007. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity *	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>							
B1		Industrial Boiler Company wood, oil-fired boiler	27.8 x 10 <sup>6</sup> Btu/hr	Western Precipitation Multiclone		PM/PM10	2/15/07 as amended 4/28/08, and 5/19/08
B2		Superior Boiler Works oil & gas-fired boiler	17.8 x 10 <sup>6</sup> Btu/hr				2/15/07 as amended 4/28/08, and 5/19/08
<b>Woodworking Equipment</b> Subject to 9 VAC 5 Chapter 50 (New or Modified)							
W1		Woodworking Equipment	32 x 10 <sup>6</sup> Bd-ft/yr	6 Fabric filters - 4 Carter Day, 1 Donaldson Day, 1 Waltz Holst	BH1-6	PM/PM10	2/15/07 as amended 4/28/08, and 5/19/08
W1		Green Lumber Processing Equipment		Closed Loop Cyclone	DCT1	PM/PM10	2/15/07 as amended 4/28/08, and 5/19/08
<b>Furniture Finishing Equipment</b> Subject to 9 VAC 5 Chapter 50 (New or Modified)							
F1		9 Spray Booths		Dry Filters		PM/PM10	2/15/07 as amended 4/28/08, and 5/19/08
F1		2 Topcoat Spray Booths & 2 Sealer Booths		Regenerative Thermal Oxidizer		VOC	2/15/07 as amended 4/28/08, and 5/19/08

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity *	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Wood Drying Equipment</b> Subject to 9 VAC 5 Chapter 50 (formerly Part 5) (New or Modified)							
D1		1 predryer, 2 kilns	predryer - 1.4 x 10 <sup>6</sup> Bd-ft; 2 kilns- 90,000 Bd-ft each	----	----	----	2/15/07 as amended 4/28/08, and 5/19/08
D2		1 predryer, 3 kilns	predryer - 1.4 x 10 <sup>6</sup> Bd-ft; 2 kilns- 90,000 Bd-ft each; 1 kiln - 45,000 Bd-ft	----	----	----	2/15/07 as amended 4/28/08, and 5/19/08

**EMISSION UNIT APPLICABLE REQUIREMENTS INVOLVING SIGNIFICANT MODIFICATION - Industrial Boiler Company Boiler (B1) and Superior Boiler Company Boiler (B2)**

**Reporting**

Condition III.D. in the current Title V operating permit requires the permittee to submit fuel quality reports within 30 days after the end of each calendar quarter. The permittee has applied for a significant modification requesting that these reports be submitted on a semiannual basis since distillate oil has not historically been used as fuel for the affected boilers and to be consistent with the semiannual reporting of fuel quality as required by the Title V operating permit for their Masco Builder Cabinet Group Merillat Atkins Plant 14 facility.

Since the boilers are subject to 40 CFR Part 60, Subpart Dc, New Source Performance Standards (NSPS) for Electric Utility Steam Generating Units and Industrial-Commercial-Institutional Steam Generating Units, reporting and recordkeeping requirements (§ 60.48c) of the subpart were reviewed for applicability to the requested reporting change. 40 CFR 60.48c (j) indicates the reporting period for the reports required under the subpart is each six-month period. The requested reporting change does not appear to violate the reporting requirement of 40 CFR 60.48c (j).

Pursuant to 9 VAC 5-80-230 A.1. of 9 VAC 5-80, Article 1, significant modification procedures shall be used for applications involving a relaxation of reporting requirements, therefore, a significant modification to the current Title V operating permit is required.

Condition III.D. in the Title V operating permit has been modified to indicate fuel quality reporting is required each calendar semiannual period.

**EMISSION UNIT APPLICABLE REQUIREMENTS INVOLVING SIGNIFICANT MODIFICATION – Furniture Finishing Equipment (F1)**

**Testing**

Condition VI.C.4. in the current Title V operating permit requires the permittee to conduct performance tests biennially for volatile organic compounds to/from the regenerative thermal oxidizer (RTO) to demonstrate compliance with control and capture efficiency requirements contained in Conditions VI.A.5 and VI.A.6 of the permit. Condition VI.C.4. indicates the permittee may request a reduction in test frequency if two consecutive performance tests demonstrate compliance with the requirements in Conditions VI.A.5 and VI.A.6. Results of the two previous performance tests demonstrate compliance with those requirements. The permittee has applied for a significant modification to reduce testing from biennially to once every five years.

Pursuant to 9 VAC 5-80-230 A.1. of 9 VAC 5-80, Article 1, significant modification procedures shall be used for applications involving significant changes to existing monitoring requirements, therefore, a significant modification to the current Title V operating permit is required.

The Title V operating permit has been modified to indicate performance tests of the RTO shall be conducted on an on-going basis no less frequent than once in every five year period after the date of the previous performance test. More frequent testing may be required if any test results do not demonstrate compliance.

## **ADDITIONAL CHANGES**

Citations for the Title V permit conditions have been changed to reflect the current minor New Source Review permit condition numbers and date.

As requested by the permittee, the name of the facility has been changed to Masco Builder Cabinet Group Merillat Atkins Plant 12.

Conditions VI.C.2. and VI.C.3. have been removed from the permit since the testing requirements contained in those conditions have been completed and are no longer applicable. Since Conditions VI.C.2. and 3. have been removed, Condition VI.C.4. has been revised and renumbered, and another condition added after it to provide the type of testing specifications referenced in the removed conditions.

Section VII. of the current permit indicates both boilers are subject to the National Emission Standards for Boilers and Process Heaters, Subpart DDDDD; however, there are no applicable requirements for the boilers in the permit, since both are firetube units. Due to recent court vacature of the National Emission Standards for Boilers and Process Heaters, Subpart DDDDD, the boilers are no longer subject to the subpart. Reference to those standards has been removed from the permit.

## **PUBLIC PARTICIPATION**

Pursuant to 9 VAC 5-80-270.A. and B., a public notice regarding the draft significant modification to the Title V operating permit was published in the *Smyth County News & Messenger* newspaper on June 4, 2008, in Smyth County, Virginia. Public comments were accepted from June 5, 2008, through July 4, 2008. A copy of the public notice was sent to the affected states, including West Virginia, North Carolina and Tennessee by postal mail on June 2, 2008. A copy of the public notice was sent to all persons on the Title V mailing list by electronic mail or postal mail no later than June 4, 2008.

Copies of the draft permit and public notice were sent to the United States Environmental Protection Agency by electronic mail on May 30, 2008, for concurrent review as a proposed permit. The 45-day USEPA review ended July 19, 2008.

No comments were received by this office from the public, USEPA, or affected states concerning the draft permit.

**COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality  
Southwest Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Merillat LP  
Atkins, Smyth County, Virginia  
Permit No. SWRO10830

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Merillat LP has applied for the renewal of a Title V Operating Permit for its Atkins, Virginia facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact:\_\_\_\_\_

Date:\_\_\_\_\_

Air Permit Manager:\_\_\_\_\_

Date:\_\_\_\_\_

Deputy Regional Director:\_\_\_\_\_Date:\_\_\_\_\_



## **FACILITY INFORMATION**

Permittee  
Merillat LP  
P.O. Box 259  
Atkins, Virginia 24311

Facility  
Merillat LP  
6373 Lee Highway

County-Plant Identification Number: 51- 173 - 00071

## **SOURCE DESCRIPTION**

NAICS Code: 337110 – Wood Kitchen Cabinet and Countertop Manufacturing

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The dried wood is processed using planers, saws, sanders, tennons, and moulding machines typical of this industry. Woodwaste is sent to two hogging machines that grind and transfer it to a silo for boiler fuel. The silo is equipped with two closed loop cyclones, which direct the air to one of six fabric filters that serve most woodworking operations at the plant. Three small fabric filters are located within the plant, and serve two enclosed sanding devices. Polyvinyl acetate glues are used to assemble the cabinet doors.

In the finishing process, a series of sealers, topcoats, and stains are applied to the cabinet doors using nine spray booths equipped with electrostatic spray guns and paint filters. Two topcoat spray booths (including flash and drying areas) and two sealer spray booths are controlled by a regenerative thermal oxidizer. Two HVLP (high volume low pressure) spray guns are used for touch up operations. Two wiping machines are used to apply stains to some products. The wipe machines are equipped with paint filters for controlling any particulates that may escape the process. The cabinet doors are dried in steam-heated ovens and two natural gas-fired ovens. The coating materials are stored in 9 bulk storage tanks, as well as drums and smaller containers. Wire hooks used to hold the cabinet doors are cleaned using acetone that is recycled and reclaimed by the manufacturer. The finished product is packaged and warehoused

for shipment by trucks.

Because the facility has the potential to emit 455.2 tons/yr of VOC, it is considered an existing major source. The boilers are subject to NSPS Subpart Dc.

The facility is a Title V major source of VOC, xylene, and total hazardous air pollutants. This source is located in an attainment area for all pollutants, and is an existing PSD major source. The facility is subject to MACT Subpart JJ for wood furniture manufacturing operations at major sources. The facility is permitted under a Minor NSR Permit issued on August 12, 2004, and amended on January 17, 2006.

### **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>							
B1		Industrial Boiler Company wood, oil-fired boiler	27.8 x 10 <sup>6</sup> Btu/hr	Western Precipitation Multiclone		PM/PM10	08/12/04 as amended 01/17/06
B2		Superior Boiler Works oil & gas-fired boiler	17.8 x 10 <sup>6</sup> Btu/hr				08/12/04 as amended 01/17/06
<b>Woodworking Equipment</b> Subject to 9 VAC 5 Chapter 50 (New or Modified)							
W1		Woodworking Equipment	32 x 10 <sup>6</sup> Bd-ft/yr	6 Fabric filters - 4 Carter Day, 1 Donaldson Day, 1 Waltz Holst	BH1-6	PM/PM10	08/12/04 as amended 01/17/06
W1		Green Lumber Processing Equipment		Closed Loop Cyclone	DCT1	PM/PM10	08/12/04 as amended 01/17/06
<b>Furniture Finishing Equipment</b> Subject to 9 VAC 5 Chapter 50 (New or Modified)							
F1		9 Spray Booths		Dry Filters		PM/PM10	08/12/04 as amended 01/17/06

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
F1		2 Topcoat Spray Booths & 2 Sealer Booths		Regenerative Thermal Oxidizer		VOC	08/12/04 as amended 01/17/06
<b>Wood Drying Equipment</b> Subject to 9 VAC 5 Chapter 50 (formerly Part 5) (New or Modified)							
D1		1 predryer, 2 kilns	predryer - 1.4 x 10 <sup>6</sup> Bd-ft; 2 kilns- 90,000 Bd-ft each	----	----	----	08/12/04 as amended 01/17/06
D2		1 predryer, 3 kilns	predryer - 1.4 x 10 <sup>6</sup> Bd-ft; 2 kilns- 90,000 Bd-ft each; 1 kiln - 45,000 Bd-ft	----	----	----	08/12/04 as amended 01/17/06

## EMISSIONS INVENTORY

Emissions are summarized in the following tables and are based on reported annual inventories.

### 2004 Actual Emissions

Emission Unit	Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
B1	0.65	22.8	0.95	5.83	18.62
B2	0.16	2.48	0.02	0.22	2.95
W1				1.08	
D1	2.79				
F1	407			0.46	
Total	410.6	25.28	0.97	7.59	21.57

### 2004 Facility Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Yr
Xylene	38.83
Toluene	1.82
Ethylbenzene	9.0
Glycol Ethers	7.23
Cumene	0.24
Methyl Isobutyl Ketone	0.35
Methyl Ethyl Ketone*	0.36
Naphthalene	1.20
Hydrogen Chloride	0.97
Methanol	2.18

\*Methyl ethyl ketone has since been delisted and is no longer considered a hazardous air pollutant.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Industrial Boiler Company Boiler (B1)**

### **Limitations**

The Industrial Boiler Company unit is subject to several state BACT requirements from Conditions 4, 15, 17, 19, 20, 24, 30, 33, 34, 35, and 44 of a minor NSR permit issued on August 12, 2004 (as amended January 17, 2006). The requirements are summarized as follows:

Condition 4 requires that PM emissions be controlled by a multicyclone collector.

Condition 15 limits fuel throughput to 12,600 tons per year of wood and 500,000 gallons per year of distillate oil.

Condition 17 lists the approved fuels for the unit – wood and distillate oil.

Condition 19 limits the sulfur content of the distillate oil to 0.5% by weight per shipment, and requires appropriate records.

Condition 20 requires that the unit be operated in compliance with 40 CFR 60 Subpart Dc.

Condition 24 limits visible emissions to 20 percent opacity, except for one six-minute period in an hour not to exceed 27 percent opacity.

Condition 30 limits emissions to:

<b>POLLUTANT</b>	<b>EMISSION LIMIT</b>	
	<b>lb/hr</b>	<b>T/yr</b>
Particulate Matter	4.8	15.5
PM10	4.3	14.0
Sulfur Dioxide	14.4	20.0
Nitrogen Oxides	13.6	48.2
Carbon Monoxide	16.7	54.2
VOC	0.5	1.6

Condition 33 requires that boilers be operated properly and that operators be trained.

Condition 34 requires that testing and monitoring ports be provided when requested.

Condition 35 requires that records of fuel consumption be kept.

Condition 44 requires the company to have written operating procedures for process and

air pollution control equipment, as well as records of operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-60-100 makes reference to 40 CFR 63, Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters, which applies to this unit. However, because it is a fire tube unit, it is exempt from all requirements.

9 VAC 5-40-900, Standard for Particulate Matter  
(see Streamlined Requirements discussion)

9 VAC 5-40-930, Standard for Sulfur Dioxide  
(see Streamlined Requirements discussion)

## Monitoring

The monitoring and recordkeeping requirements in Condition 35 of the NSR permit have been modified to meet Part 70 requirements.

The permit requires proper operation of the boiler in conjunction with the operation of a multicyclone to comply with the particulate matter and the visible emission requirements for the Industrial wood-fired boiler. The multicyclone will be inspected annually for structural integrity.

The permit contains a requirement to perform weekly inspections of the boiler stack. If visible emissions are present, timely corrective action must be taken such that no visible emissions are present, or a six-minute visible emission evaluation (VEE) must be performed according to 40 CFR 60, Appendix A, Method 9. If during the six-minute period, any violations of the 20% opacity standard are noted, a 60-minute VEE is required to demonstrate compliance with the standard. This will satisfy the periodic monitoring requirement for the visible emission limitation included in the permit.

Compliance with the emission limits will be determined by computations involving acceptable emission factors as shown below:

a. Wood combustion

$$E = F \times W, \text{ where}$$

E = Emission rate (lb/time period)

F = Emission factors from stack test or AP-42, Section 1.6 (09/2003)

PM = 2.39 lb/T of woodwaste (from stack test results)

PM10 = 2.15 lb/T of woodwaste (from stack test results)

NO<sub>x</sub> = 0.49 lb/MMBtu (AP-42, Table 1.6-2)

SO<sub>2</sub> = 0.025 lb/MMBtu (AP-42, Table 1.6-2)

CO = 0.60 lb/MMBtu (AP-42, Table 1.6-2)

VOC = 0.017 lb/MMBtu (AP-42, Table 1.6-3)

W = Wood combusted (T/time period), or maximum rated heat input capacity in MMBtu/hr

b. #2 oil combustion

$$E = F \times O, \text{ where}$$

E = Emission rate (lb/time period)

F = Emission factors from AP-42, Tables 1.3-1 – 6 (09/1998) shown below

PM = 3.3 lb/1000 gal of oil

PM10 = 3.3 lb/1000 gal of oil

NOx = 20 lb/1000 gal of oil

SO<sub>2</sub> = 71 lb/1000 gal of oil

CO = 5 lb/1000 gal of oil

VOC = 0.2 lb/1000 gal of oil

O = Oil combusted (1000 gal/time period)

The hourly and annual particulate matter emission limits from wood and No. 2 oil combustion were established based on the maximum rated capacity of the unit, insuring that the likelihood of exceedance is very small as long as the unit is maintained and operated properly. The particulate matter emission limit during wood combustion was developed from stack test results for the unit upon installation. Compliance with these emission limits will be demonstrated by proper maintenance and operation.

#### **Compliance Assurance Monitoring (CAM) Applicability**

The company did not identify this unit as being subject to CAM requirements. The company ruled out this possibility, but did not provide documentation supporting that assessment. The following discussion is offered to address CAM.

The unit is subject to an emission limitation for PM10 (14 T/yr) that is based on the required use of a multicyclone collector as well as wood fuel and distillate oil consumption limitations. The multicyclone collector is reported to provide 82% control of particulates. The unit is limited to 12,600 tons per year of wood fuel @ 7,000 Btu/lb. It is also limited to consumption of 500,000 gallon per year of distillate oil. The company established a PM10 emission factor through a stack test in 1991 (2.15 lb PM10/T of wood). Table 1.3-1 of AP-42 is used to establish particulate matter emission limits from distillate oil combustion (3.3 lb/1000 gal).

Using the established PM10 emission limit and the presumed control efficiency of the multicyclone, potential “pre-control” emissions may be estimated as follows:

$$(14 \text{ T/yr}) / (1 - 0.82) = 77.8 \text{ T/yr} \quad [\text{pre-control PM10}]$$

Since this figure is smaller than the major source threshold for PM10 (100 T/yr), CAM requirements do not apply to this unit.

#### **Recordkeeping**

The NSR permit includes requirements for maintaining records of all monitoring and testing



required by the permit. These records include annual fuel consumption, written operating procedures for the boiler and associated control device, maintenance schedule, fuel supplier certifications, and operating data that can be used to determine emissions. The company will also keep multicyclone inspection records, operator training records, and records of emissions estimates.

## Testing

The permit does not require source tests for this unit. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## Reporting

No specific reporting requirements for this unit have been included in the permit.

## Streamlined Requirements

9 VAC 5-50-10 D states that the standards contained in Chapter 40 apply to new sources if their provisions are more stringent than the standards in Chapter 50, Chapter 80, or any permit issued pursuant to Chapter 80. Since Chapter 40 contains emission standards for particulate matter and sulfur dioxide from boilers, we must determine which standards are more restrictive. If the standards in Chapter 40 are more restrictive than the established permitted emission limits, then they must be included in the Title V permit.

### 9 VAC 5-40-900, Standard for Particulate Matter

Condition 30 of the NSR permit limits hourly particulate matter emissions from this unit to 4.8 lb/hr. Since the boiler was installed prior to 1979, by definition it is a fuel burning equipment installation. According to 9 VAC 5-40-900 A.1.b, the unit may not emit more particulate matter than can be calculated by the formula:

$$E = 1.0906 H^{-0.2594} \quad \text{where } E \text{ is particulate emissions in lb/MMBtu, and} \\ H \text{ is the heat capacity of the unit (27.8 MMBtu/hr).}$$

The resulting particulate matter emission standard is,

$$E = 1.0906(27.8)^{-0.2594} \text{ lb/MMBtu} = 0.46 \text{ lb/MMBtu} \\ (0.46 \text{ lb/MMBtu})(27.8 \text{ MMBtu/hr}) = 12.8 \text{ lb/hr}$$

While the two standards are not expressed in common terms, an argument may be made that they are comparable. The lb/MMBtu expression represents an instantaneous quantity, but is practically verified by measurement over the course of a longer time frame, usually one hour. As can be seen from the above calculation, the Chapter 40 standard would allow emissions to exceed the hourly emission limits (approximately double). The Chapter 40 standard is considered less restrictive and therefore inapplicable to this unit. This standard may be streamlined by the more stringent particulate matter emission limitation.

### 9 VAC 5-40-930, Standard for Sulfur Dioxide

9 VAC 5-40-930 limits sulfur dioxide emissions from boilers according to the formula

$S = 2.64 K$  where, S is lb/hr of SO<sub>2</sub>, and  
K is the heat capacity of the unit (27.8 MMBtu/hr).

$$(2.64)(27.8) = 73.4 \text{ lb/hr SO}_2$$

Condition 30 of the NSR permit limits the sulfur emissions to 14.4 pounds per hour. The requirements of 9 VAC 5-40-930 are therefore less restrictive than current permit limitations, and streamlining of this requirement is appropriate.

## **EMISSION UNIT APPLICABLE REQUIREMENTS – Superior Boiler Company Boiler (B2)**

### **Limitations**

The Superior Boiler Company unit is subject to several state BACT requirements from Conditions 14, 18, 19, 20, 23, 29, 33, 34, 35 and 44 of a minor NSR permit issued on August 12, 2004 (as amended January 17, 2006). The requirements are summarized as follows:

Condition 14 limits fuel consumption to 156 million cubic feet of natural gas/yr and 75,600 gallons of distillate oil/yr.

Condition 18 lists the approved fuels for the unit - natural gas and distillate oil.

Condition 19 limits the sulfur content of the distillate oil to 0.5% sulfur by weight per shipment, and requires the company to obtain certifications from the fuel supplier.

Condition 20 requires that the unit be operated in compliance with 40 CFR 60 Subpart Dc.

Condition 23 limits opacity from the unit to 10%, except one six-minute period not to exceed 20%.

Condition 29 limits pollutant emissions to those listed below:

<b>POLLUTANT</b>	<b>EMISSION LIMIT</b>	
	<b>lb/hr</b>	<b>T/yr</b>
Particulate Matter	0.4	0.7
PM10	0.4	0.7
Sulfur Dioxide	9.3	2.8
Nitrogen Oxides	2.6	8.6
Carbon Monoxide	1.5	6.7

Condition 33 requires that boilers be operated properly and that operators be trained.

Condition 34 requires that testing and monitoring ports be provided when requested.

Condition 35 requires the company to keep records of fuel consumption.

Condition 44 requires the company to have written operating procedures for process and air pollution control equipment, as well as records of operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-60-100 makes reference to 40 CFR 63, Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters, which applies to this unit. However, because it is a fire tube unit, it is exempt from all requirements.

9 VAC 5-40-900 B, Standard for Particulate Matter  
(see Streamlined Requirements discussion)

9 VAC 5-50-80, Standard for Visible Emissions.  
(see Streamlined Requirements discussion)

## **Monitoring**

The monitoring and recordkeeping requirements in Condition 35 of the NSR permit have been modified to meet Part 70 requirements.

The emission limits for this boiler were established using current AP-42 emission factors for such a unit. The hourly emission limits from No. 2 oil and natural gas combustion were established based on the maximum rated capacity of the unit, insuring that the likelihood of exceedance is very small as long as the unit is maintained and operated properly. Annual emission limits were established based on the annual fuel throughput limits. Compliance with these emission limits will be demonstrated through compliance with the fuel throughput limits.

The permit requires proper operation of the boiler to comply with the particulate matter and the visible emission requirements for the Superior oil-fired boiler. Since the unit operates by combustion of pipeline quality natural gas and distillate oil, no additional monitoring is required to show compliance with the opacity limit of 10%.

Compliance with the sulfur dioxide emissions will be determined based on the sulfur content of the distillate oil. Emission limits are based on the maximum possible emissions from oil containing 0.5% sulfur.

## **Recordkeeping**

The minor NSR permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include annual fuel consumption, written operating procedures for the boiler, a maintenance schedule, fuel supplier certifications, and operating data

that can be used to determine emissions. The company will also keep operator training records and records of emissions estimates.

### Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### Reporting

No specific reporting requirements for this unit have been included in the permit.

### Streamlined Requirements

9 VAC 5-50-80, Standard for Visible Emissions, requires that visible emissions from sources constructed after 1972 not exceed 20% opacity. Since the Minor NSR permit requires a more stringent opacity limit of 10%, the requirement may be streamlined.

9 VAC 5-50-10 D states that the standards contained in 9 VAC 5 Chapter 40 apply to new sources if their provisions are more stringent than the standards in 9 VAC 5 Chapter 50, 9 VAC 5 Chapter 80, or any permit issued pursuant to 9 VAC 5 Chapter 80. Since 9 VAC 5 Chapter 40 contains emission standards for particulate matter and sulfur dioxide from boilers, we must determine which standards are more restrictive. If the standards in 9 VAC 5 Chapter 40 are more restrictive than the established permitted emission limits, then they must be included in the Title V permit. Otherwise, they may be streamlined.

9 VAC 5-40-900, Standard for Particulate Matter  
Condition 29 of the NSR permit limits particulate matter emissions from this unit to 0.4 lb/hr. 9 VAC 5-40-900 B, Standard for Particulate Matter, requires a particulate matter limit determined by

$$E = 1.0906 H^{-0.2594} \quad \text{where } E \text{ is particulate emissions in lb/MMBtu and} \\ H \text{ is heat rating of the unit (17.8 MMBtu/hr).}$$

The resulting allowable particulate matter emission rate is,

$$E = 1.0906(17.8)^{-0.2594} \text{ lb/MMBtu} = 0.52 \text{ lb/MMBtu} \\ (0.52 \text{ lb/MMBtu})(17.8 \text{ MMBtu/hr}) = 9.3 \text{ lb/hr}$$

While the two standards are not expressed in common terms, the argument may be made that they are comparable. The lb/MMBtu expression represents an instantaneous quantity, but is practically verified by measurement over the course of a longer time frame, usually one hour. As can be seen from the above calculation, the Chapter 40 standard would allow emissions to exceed the hourly emission limits (by over twenty times). The Chapter 40 standard is considered much less restrictive and therefore inapplicable to this unit. This standard may be streamlined by the more stringent particulate matter emission limitation.

9 VAC 5-40-930, Standard for Sulfur Dioxide

9 VAC 5-40-930 limits sulfur dioxide emissions from boilers according to the formula

$S = 2.64 K$  where, S is lb/hr of SO<sub>2</sub>, and  
K is the heat capacity of the unit (17.8 MMBtu/hr).

$$(2.64)(17.8) = 47.0 \text{ lb/hr SO}_2$$

Condition 29 of the NSR permit limits the sulfur emissions to 9.3 pounds per hour. The requirements of 9 VAC 5-40-930 are therefore less restrictive than current permit limitations, and streamlining of this requirement is appropriate.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Woodworking Operations (W1)**

### **Limitations**

The woodworking operations have state BACT requirements from Conditions 6, 7, 13, 25, 31, 34, 35, and 44 of a minor NSR permit issued on August 12, 2004 (as amended January 17, 2006). The requirements are summarized as follows:

Condition 6 requires that equipment processing green lumber be connected to a cyclone with closed loop transfer for controlling particulate matter emissions.

Condition 7 requires that particulate matter emissions from the dry wood processing equipment be controlled by baghouses.

Condition 13 limits the rough lumber throughput to 7,680 board-feet/hr and 32,000,000 board-feet/yr.

Condition 25 limits visible emissions from wood processing to 5% opacity.

Condition 31 limits particulate matter and PM10 emissions from woodworking equipment to 0.01 gr/dscf and 1.5 T/yr.

Condition 34 requires that testing and monitoring ports be provided when requested.

Condition 35 requires the company to keep records of wood throughput.

Condition 44 requires the company to have written operating procedures for process and air pollution control equipment, as well as records of operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-80, Standard for Visible Emissions, requires 20% opacity  
(see Streamlined Requirements discussion below)

9 VAC 5-50-90, Standard for Fugitive Dust, requires that reasonable means be used to reduce fugitive dust

## **Monitoring**

The monitoring and recordkeeping requirements in Condition 35 of the NSR permit have been modified to meet Part 70 requirements.

If visible emissions are seen from a woodworking stack, it is reasonable to assume that there is a problem with one of the control devices. The woodworking equipment in operation is required to meet a particulate matter emission limitation of 0.01 gr/dscf. As long as the particulate emissions are vented through a properly operating control device, the standard is easily attained. If visible emissions are observed from the fabric filter exhausts, there is high probability that a maintenance problem exists. Baghouse exhausts are subject to Compliance Assurance Monitoring requirements since pre-controlled emissions of particulate matter are potentially greater than the major source threshold. These requirements are discussed below.

In accordance with the fugitive dust requirements, the company is required to cover all conveyors that are used for the collection and transfer of collected sawdust and shavings.

### **Compliance Assurance Monitoring (CAM)**

The company submitted a CAM plan for evaluating six fabric filters used to control woodworking emissions. The company proposes to conduct daily visible emissions checks of each baghouse exhaust. Since the closed loop cyclone has no direct exhaust to the atmosphere, the company proposed no monitoring.

The company will check each baghouse exhaust daily for the presence of visible emissions. If visible emissions are present, corrective action must be taken such that no visible emissions occur. The presence of visible emissions will document an excursion. Excursions will be identified in the semi-annual monitoring report. In addition, an annual internal inspection of each fabric filter and cyclone is required to ensure structural integrity. These measures will satisfy the compliance assurance monitoring requirements for the baghouses and cyclone.

## **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include monthly and annual lumber throughput and weekly observations and annual inspection results.

### **Testing**

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## **Reporting**

Monitoring excursions as described above will be included in the semi-annual monitoring report required in the General Conditions of this permit.

## **Streamlined Requirements**

9 VAC 5-50-80, Standard for Visible Emissions, requires 20% opacity for sources of visible emissions. However, the NSR permit requires that visible emissions from woodworking processes meet 5% opacity. Since the permit requirements are more stringent than those of 9 VAC 5-50-80, streamlining is appropriate. The Title V permit will contain 5% opacity requirements.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Wood Drying Operations (D1 & D2)**

### **Limitations**

The Wood drying operations have state BACT requirements from Conditions 13, 32, 34, 35 and 44 of the minor NSR permit issued on August 12, 2004 (as amended January 17, 2006). The requirements are summarized as follows:

Condition 13 limits rough lumber throughput to 7,680 bd-ft/hr and 32,000,000 bd-ft/yr.

Condition 32 limits the annual VOC emissions from kilns to 5.4 T/yr.

Condition 34 requires that testing and monitoring ports be provided when requested.

Condition 35 requires the company to keep records of wood throughput.

Condition 44 requires the company to have written operating procedures for process and air pollution control equipment, as well as records of operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

40 CFR 63, Subpart DDDD – National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products applies to lumber dry kilns at major sources of HAP emissions. However, only initial notification requirements apply.

### **Monitoring**

The monitoring and recordkeeping requirements in Condition 35 of the NSR permit have been modified to meet Part 70 requirements.

This operation is not a source of visible emissions and is therefore not subject to opacity requirements on stack exhausts. Since no particulate emissions are expected from this operation, no opacity observations are required to show compliance.

Monthly and annual lumber throughput must be monitored. VOC emissions will be calculated using approved emission factors for hardwood and softwood.

### **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include monthly and annual lumber throughput, VOC emissions, and the ratio of hardwood to softwood.

### **Testing**

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### **Reporting**

There are no specific reporting requirements for this operation.

### **Streamlined Requirements**

No streamlining is proposed for this operation.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Finishing Operations (F1)**

### **Limitations**

The finishing operations have several applicable requirements from Conditions 3, 5, 8, 9, 10, 11, 12, 16, 21, 22, 26, 27, 28, 34, 35, 36, 37, 38, 39, and 44 of the minor NSR permit issued on August 12, 2004 (as amended January 17, 2006). The requirements are summarized as follows:

Condition 3 requires that particulate matter emissions from the spray booths be controlled by dry filters.

Condition 5 requires that particulate matter emissions from an automatic door wiping station be controlled by a dry filter system.

Condition 8 requires that VOC emissions from the two topcoat spray booths (including flash and drying areas) and the two sealer spray booths be controlled by a regenerative thermal oxidizer (RTO).

Condition 9 requires that VOC control efficiency of the RTO meet 95%.

Condition 10 requires that VOC capture efficiency of the RTO meet 95%.

Condition 11 requires that the combustion temperature of the RTO be maintained within 50°F of that demonstrated by the most recent successful stack test.

Condition 12 requires that the RTO be equipped with a continuous temperature measuring device.

Condition 16 limits fuel for the RTO to natural gas.



Condition 21 limits visible emissions from the RTO exhaust to 5% opacity.

Condition 22 limits visible emissions from spray booth, flash area, automatic wiping station, and drying oven exhausts to 5% opacity.

Condition 26 requires that total VOC throughput to finishing operations be limited by the following formula,

$$X + Y(1 - \text{OCE}_{\text{Topcoat}}/100) + Z(1 - \text{OCE}_{\text{Sealer}}/100) \leq 455.2 \text{ tons/yr}$$

where:

X = VOC throughput to uncontrolled operations

Y = VOC throughput to two controlled topcoat spray booths

OCE<sub>Topcoat</sub> = overall VOC control efficiency of two topcoat booths (capture & control ≥ 90%)

Z = VOC throughput to two controlled sealer spray booths

OCE<sub>Sealer</sub> = overall VOC control efficiency of two sealer booths (capture & control ≥ 60%)

Condition 27 limits emissions from the RTO to the quantities below:

POLLUTANT	Lb/hr	T/yr
Carbon Monoxide	0.4	1.3
NO <sub>2</sub>	0.3	1.5

Condition 28 limits pollutant emissions from finishing operations to the quantities in the table below:

POLLUTANT	Lb/hr	T/yr
Particulate Matter	0.5	0.6
PM10	0.5	0.6
Volatile Organic Compounds	374.2	455.2

Condition 34 requires that testing and monitoring ports be provided when requested.

Condition 35 requires the company to maintain records of coating usage.

Condition 36 requires the company to conduct performance tests to show compliance with RTO capture and control efficiencies for VOC.

Condition 37 requires the company to conduct initial visible emissions tests on the RTO exhaust during the initial performance test.

Condition 38 requires the company to conduct biennial performance tests to demonstrate continual compliance with RTO capture and control efficiencies for VOC.

Condition 39 requires the company to submit initial notifications of dates of modification of the RTO and performance testing.

Condition 44 requires the company to have written operating procedures for process and air pollution control equipment, as well as records of operator training.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-60-100, National Emission Standards for Hazardous Air Pollutants: Wood Furniture Manufacturing Operations - 40 CFR 63.800 - 819.

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.  
(see Streamlining discussion)

## **Monitoring**

The monitoring and recordkeeping requirements in Condition 35 of the NSR permit have been modified to meet Part 70 requirements.

The permit requires use of dry filters on spray booths to demonstrate compliance with the visible emission requirements. A properly operating dry filter can comply with the 5% opacity limit. The permittee will be required to perform weekly visible emission observations of each spray booth exhaust serving the finishing operation and the RTO exhaust. If visible emissions are present, timely corrective action must be taken such that no visible emissions are present, or a six-minute visible emission evaluation (VEE) must be performed according to 40 CFR 60, Appendix A, Method 9. If during the six-minute period, any violations of the 5% opacity standard are noted, a 60-minute VEE is required to demonstrate compliance with the standard. Weekly observations will satisfy the periodic monitoring requirement for the visible emission limitation. Frequent checks for visible emissions will indicate malfunctions of the control equipment. As long as the control equipment is operating properly, there is little likelihood of violating the visible emission limitation.

The Title V permit includes a requirement to monitor and record the hourly, monthly, and annual emissions of particulate matter and VOC, based on material balance, and the number of hours per month of operation. The VOC content of each coating material will be determined using appropriate EPA test methods (Method 24). Material safety data sheets (MSDS) or certified product data sheets (CPDS) may be relied upon provided the information contained therein is determined using approved EPA test methods. The company is also responsible for the monitoring requirements of the Wood Furniture MACT (see Facility-wide requirements).

### **Compliance Assurance Monitoring (CAM)**

The company submitted a CAM plan for evaluating the performance of the RTO serving four spray booths. The CAM plan requires the company to continuously monitor the temperature of the RTO combustion chamber. The temperature must be maintained at no more than 50°F below the temperature established in the most recent stack test that demonstrated compliance. Any temperature reading (3-hr avg.) that departs more than 50°F below the stack test temperature will constitute an excursion requiring the company to take correction action. Excursions will be reported in the semi-annual monitoring report.

In addition, the company will conduct an annual inspection of the burner to verify proper operation of the device, and conduct biennial emissions testing to confirm control and capture efficiencies of the control system.

### **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the hourly, monthly and annual throughput of particulate matter and VOC. Also, the company will record the results of the weekly emissions observations.

Records are also required for scheduled and non-scheduled maintenance on the air pollution control equipment and training of operators of the equipment to include names of trainees, date of training, and nature of training.

RTO temperature will be monitored continuously by strip chart recorder.

The weekly observations and recordkeeping required by the permit will satisfy the periodic monitoring requirement for the spray booths and the RTO. Recordkeeping requirements of the MACT are given in the Facility-wide requirements.

### **Testing**

Initial and subsequent biennial testing of the VOC capture and control efficiencies of the RTO are required by the NSR permit. VOC capture will be tested using a negative pressure measurement method. VOC emission control will be determined using EPA Methods 25, 25A, or 25B. Visible emissions testing of the RTO exhausts using Method 9 is also required.

### **Reporting**

Monitoring excursions as described above will be included in the semi-annual monitoring report required in the General Conditions of this permit.

### **Streamlined Requirements**

9 VAC 5-50-80, Standard for Visible Emissions, requires 20% opacity for sources of visible emissions. However, the NSR permit requires that visible emissions from spray booth and RTO exhausts meet 5% opacity. Since the permit requirements are more stringent than those of 9

VAC 5-50-80, streamlining is appropriate. The Title V permit will contain 5% opacity requirements.

## **FACILITY - WIDE APPLICABLE REQUIREMENTS**

### **Limitations**

The permittee is subject to the 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT). All applicable limitations from the Wood Furniture MACT have been included in the permit. The permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Applicable limitations from the general provisions have also been included in the permit.

The boilers at the facility are affected sources according to 40 CFR Subpart DDDDD (§63.7490(a)), National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters. Even though there are no requirements for fire tube boilers, the MACT will be cited as technically applicable.

Likewise, the kilns at the facility are considered affected sources according to 40 CFR Subpart DDDD (§63.2231(a)), National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. The only requirements that apply, however, involve the initial notification, which has already been submitted by the company. This MACT will also be cited as technically applicable.

### **Monitoring**

The Wood Furniture MACT contains requirements for continuous compliance, including monthly and/or daily recordkeeping depending on the method of compliance. These requirements have been incorporated in the permit. The Wood Furniture MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

### **Recordkeeping**

The Wood Furniture MACT contains requirements for recordkeeping that include maintaining certified product data sheets for each material used and all calculations used to demonstrate continuous compliance. No additional recordkeeping has been included in the Title V permit.

### **Testing**

The permit does not require source tests. The Department and EPA have the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or

standard.

## **Reporting**

The Wood Furniture MACT requires that a source demonstrate continuous compliance and submit monitoring results semi-annually. Because the company submits other Title V and State-required reports, it requested that the reporting timeframes and submission dates be consolidated for all MACT, Title V, and State-required reports.

Altering submission dates and reporting/recordkeeping timeframes is allowed according to 40 CFR 63.9(i) and 63.10(a)(5), as long as the State has appropriate delegated authority and the proper notifications/approvals are sought. The company made a written request, and DEQ responded with an approval that was forwarded to EPA.

The dates for the monitoring reports have now been adjusted to coincide with the semi-annual compliance reports. The semi-annual compliance and monitoring reports are due on March 1 and September 1, covering the periods January 1 to June 30 and July 1 to December 31, respectively.

## **Streamlined Requirements**

The initial notification requirements associated with the Wood Furniture MACT have not been included in the permit because the source has already completed the notifications.

The permittee has opted not to use a control device to meet the MACT requirements. Therefore, all requirements regarding a control device have not been included in the permit.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

### **Comments on General Conditions**

#### **B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001."

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

**F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

**J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

**U. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

**Y. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to

insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

## **FUTURE APPLICABLE REQUIREMENTS**

The company did not identify any future requirements.

## **INAPPLICABLE REQUIREMENTS**

The company did not identify any requirements that do not apply.

## **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
AMS1	Gas-fired air makeup system rated at 8.25 MMBtu/hr heat input (plant ventilation)	9 VAC 5-80-720 A.2 & A.3		
AMS2	Gas-fired air makeup system rated at 19.25 MMBtu/hr heat input (plant ventilation)	9 VAC 5-80-720 A.2 & A.3		
PW	Parts Washer	9 VAC 5-80-720 B	VOC	
ST	Storage Tanks	9 VAC 5-80-720 B	VOC	
G1	Wood Gluing	9 VAC 5-80-720 B	VOC	

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

## **CONFIDENTIAL INFORMATION**

The company did not submit a request to maintain any of the information confidential.

## **PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in the *Smyth County News & Messenger* from April 29, 2006 to May 30, 2006. No comments were received from the public or from affected states. EPA's 45-day review period extended from April 29, 2006 through June 14, 2006, resulting in no comments.